

NICHOLAS A. TRUTANICH
United States Attorney
Nevada Bar Number 13644
BIANCA R. PUCCI
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: 702.388.6336 / Fax: 702.388.6418
bianca.pucci@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN THOMAS PARSHALL,
a.k.a. "Kiwi,"

Defendant.

Case No.: 2:20-CR-00308-JAD-DJA

Government Disclosure Statement

On November 25, 2020, pursuant to Local Criminal Rule 16-1(b)(2), Bianca R. Pucci, Assistant United States Attorney, contacted Robert M Draskovich , Jr, Esq., counsel of record for defendant STEPHEN THOMAS PARSHALL, to discuss scheduling of discovery in the instant case. The Government agrees to provide discovery in this case as follows:

Discovery Schedule

A. The Government has provided or will provide or permit the defendant to inspect and copy or photograph:

- (1) All statements, documents, and objects, including audio or video recordings, required to be disclosed under Federal Rules of Criminal Procedure 16(a)(1)(A)-(F).
- (2) All search warrants and supporting affidavits, which relate to evidence that may be offered at trial.
- (3) The Government will provide expert disclosures as required under Federal Rule of Criminal Procedure 16(a)(1)(G).
- (4) To date, the Government has made the following disclosures:
 - a. LVMPD Arrest Report (Terrorism) (000001-000007);
 - b. LVMPD Forensic Exam Report (000008-000017);
 - c. Search Warrant Digital Storage Devices for CP (000018-000136);
 - d. Forensic Exam Report (000137-000142);
 - e. Officer's Report, Forensic Findings (000143-000147);
 - f. CPS Referral Summary (000148-000152);
 - g. Transcript – I.O. (000153-000267);
 - h. Transcript – A.O. (000278-000284);
 - i. Transcript – S.O. (000285-000309);
 - j. Transcript – C.O. (000310-000324);
 - k. Transcript – Veronica O. (000325-000353);
 - l. FBI Opening Communication (000354-000355);
 - m. FD-302 Interview Notes on I.O. (000356-000357);
 - n. FBI Veronica O. (000358-000369);
 - o. Interview Notes on Veronica O. (000370);
 - p. Evidence Sheets (000371-000387);
 - q. FBI Evidence (000388-000391);
 - r. Receipts (000392-000393);
 - s. Consent (000394-000395);
 - t. FBI Preservation Requests (000396-000410);
 - u. FBI Identification of Phillip Merrill (000411-000413);
 - v. LVMPD Declaration of Warrant (000414-000423);
 - w. Request for Prosecution (000424-000425);
 - x. 302 Review of Chats with M.B. (000426-000429);
 - y. Whisper (000430-000440);
 - z. Kik (000441-000488);
 - aa. 302 – Interview of M.B. (000489);
 - bb. 302 – Review of Electronic Items Seized from 2260 Brenda Lane (000490-000494);
 - cc. Tumblr (000495-000506);

dd. DMV Parshall (000507-000511);
 ee. Declaration of Arrest (000512-000521);
 ff. Kik Subscriber Data (000522-000525);
 gg. Kik Chats (000526-000592);
 hh. NCIC – M.B. (000593-000600);
 ii. NCJIS – Parshall (000601-000603);
 jj. NCJIS Warrant (000604-000605);
 kk. Kik Subscriber ixxxxxxb (000606-000607);
 ll. 1B16 – Supplemental Review (000608-000609);
 mm. 1B55 – Supplemental Review (000610-000611);
 nn. 302 - Interview of M.B. (000612-000613);
 oo. Tumblr Cyber Tip (000614-000615);
 pp. Tumblr Search Warrant (000616-000619);
 qq. Kik Search Warrant (000620-000678);
 rr. Conversations (000679);
 ss. Medical Records (000680-000705);
 tt. Subpoenas (000706-000789);
 uu. Tumblr Search Warrant (000790-000829) and
 vv. Kik Motion to Unseal (000830-000831).

B. Pursuant to pursuant to the Adam Walsh Act, 18 U.S.C. § 3509(m), the forensic and digital evidence containing child pornography is available for defense counsel and their expert(s) review at the Internet Crimes Against Children Task Force of the Las Vegas Metropolitan Police Department.

C. The Government is unaware of any exculpatory information. The Government will provide any subsequently discovered exculpatory information reasonably promptly upon its discovery. The Government will provide impeachment information relating to government witnesses who will testify at a pre-trial hearing, trial, or sentencing sufficiently in advance of the hearing, trial, or sentencing to allow the hearing, trial, or sentencing to proceed efficiently.

D. The Government hereby makes any and all demands for reciprocal disclosures from the defendant under Federal Rules of Criminal Procedure 12.1, 12.2, 12.3, and 16, including but not limited to the following, to be provided prior to trial:

(1) All documents, objects, and reports of examination required under Federal Rules of Criminal Procedure 16(b)(1)(A) and (B).

(2) All expert disclosures required under Federal Rule of Criminal Procedure 16(b)(1)(C).

(3) All notices of any defenses under Federal Rule of Criminal Procedure 12.1.

(4) Any summaries, charts, or calculations the defense intends to offer at trial.

E. The Government will no later than 5 days before trial or at such subsequent time as the Government learns any of the following information:

(1) Disclose any summaries, charts, or calculations the Government intends to offer at trial.

(2) Identify recordings, transcripts of recordings, or portions thereof the Government intends to offer at trial.

(3) Disclose any reports or memoranda of interviews of witnesses the Government intends to call in its case in chief.

(4) Disclose any statements of witnesses under Title 18, United States Code, Section 3500.

F. If the Government withholds the disclosure of items subject to discovery under Federal Rule of Criminal Procedure 16 or case law or statute, it will either: (1) provide notice to the defense of its intent to withhold disclosure and describe the nature of the item and the basis for withholding disclosure; or (2) submit in camera a motion to the court for a protective order describing the nature of the item, the basis for withholding disclosure, and the need for in camera review and any sealing

